



g) By way of their proposed Third Amended Scheduling Order, the Parties seek an extension of all forthcoming deadlines as set forth below, which includes approximately a 90-day extension of the current date which this action is subject to be called for trial. The forthcoming deadlines and proposed new deadlines are as follows:

<b><u>Item</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed New Deadline</u></b>
Plaintiff's Expert Disclosures	August 12, 2022 (Plaintiffs have met this deadline)	<i>Not applicable</i>
Defendant's Expert Disclosures	October 14, 2022 (Defendants have met this deadline)	<i>Not applicable</i>
Affidavits of Records Custodian	January 27, 2023	April 21, 2023
End of Discovery	December 9, 2022	April 21, 2023
Mediation	December 16, 2022	March 10, 2023
Motions	January 20, 2023	May 5, 2023
Trial	April 17, 2023	July 17, 2023

WHEREFORE, the Parties move the Court for entry of a Third Amended Scheduling Order (a Proposed Order will be presented to the Court along with this Motion).

**[SIGNATURE PAGE TO FOLLOW]**

WITH CONSENT:

s/Phillip Barber (*with permission*)

Richard A. Harpootlian (Fed ID No.1730)  
Christopher P. Kenney (Fed ID No. 11314)  
Phillip D. Barber (Fed ID No. 12816)  
Richard A. Harpootlian, P.A.  
1410 Laurel Street (29201)  
PO Box 1090  
Columbia, SC 29202  
(803) 252-4848 -Telephone  
[rah@harpootlianlaw.com](mailto:rah@harpootlianlaw.com)  
[cpk@harpootlianlaw.com](mailto:cpk@harpootlianlaw.com)  
[pdb@harpootlianlaw.com](mailto:pdb@harpootlianlaw.com)

Matthew E. Yelverton (Fed ID No. 7966)  
Yelverton Law Firm, LLC  
60 Folly Road  
Charleston, SC 29407  
(843) 574-8824 – Telephone  
[myelverton@ylitigators.com](mailto:myelverton@ylitigators.com)

*Attorneys for Plaintiff*

October 24, 2022  
Spartanburg, SC

s/Chance M. Farr

Chance M. Farr (Fed ID No. 12522)  
William B. Darwin, Jr. (Fed ID No.5422)  
Todd R. Flippin (Fed ID No. 11753)  
Holcombe Bomar, P.A.  
PO Box 1897  
Spartanburg, SC 29306  
(864) 594-5300 - Telephone  
[cfarr@holcombebomar.com](mailto:cfarr@holcombebomar.com)  
[kdarwin@holcombebomar.com](mailto:kdarwin@holcombebomar.com)  
[tflippin@holcombebomar.com](mailto:tflippin@holcombebomar.com)

*Attorneys for Defendants*

